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**COMMENTS OF DELTA WETLANDS  
FOR APRIL 26, 1994 WORKSHOP OF THE  
STATE WATER RESOURCES CONTROL BOARD:  
REVIEW OF STANDARDS FOR THE  
SAN FRANCISCO BAY/SACRAMENTO-SAN JOAQUIN DELTA ESTUARY**

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**I. Introduction**

Delta Wetlands offers the following comments in response to the State Water Resources Control Board's ("SWRCB") Notice of Public Workshop, dated March 25, 1994, regarding Review of the Standards for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary ("Notice"). Delta Wetlands appreciates the opportunity to participate in the SWRCB's process to develop a water quality control plan. What follows is a brief description of the Delta Wetlands project and Delta Wetlands' responses to the questions raised in the SWRCB's Notice.

**II. The Delta Wetlands Project**

The Delta Wetlands project is a proposed water supply project which includes four Delta islands (Bouldin Island, Holland Tract, Webb Tract and Bacon Island). The project proponent's preferred alternative proposes that Bouldin Island and Holland Tract be dedicated for habitat purposes with only incidental water supply benefits. This aspect of the Delta Wetlands project will significantly enhance the Delta's habitat for terrestrial species. Webb Tract and Bacon Island are proposed to be used primarily as water supply reservoirs on a year-round basis with only incidental (but sometimes significant) environmental benefits. The proposed water supply storage capacity of this project is approximately 230,000 acre-feet per year. An updated draft environmental impact report/statement on the Delta Wetlands project is expected to be distributed for public comment this summer. Delta Wetlands expects water to be available from its project by 1996.

**III. Responses to SWRCB Notice**

**A. Which standards should the SWRCB focus on during this triennial review?**

The Notice indicates that the SWRCB should use this process to review the Environmental Protection Agency's draft standards for protection of fisheries-related beneficial uses in the Bay-Delta Estuary, published in the Federal Register on January 6, 1994 ("EPA's Draft Standards"). Delta Wetlands agrees that the SWRCB's review of the EPA's Draft Standards should be a high, if not the highest, priority in this process.

The SWRCB's process is the only opportunity for an in-depth technical hearing on EPA's Draft Standards provided to those with interests in the Delta or the public generally. Because of the full hearing process that can be provided by the SWRCB, in addition to the full participation of Delta interests expected in this process, EPA's Draft Standards can be appropriately explored. This exploration should include the environmental benefits expected to result from EPA's Draft Standards as well as the unintended and unnecessary effects of those proposed standards.

In addition to reviewing EPA's Draft Standards as proposed, Delta Wetlands believes that the SWRCB should consider what portions of its draft Decision 1630 are appropriate for inclusion in the standards ultimately adopted (i.e. QWEST). Of critical importance to any standard, is not only the amount of water required to meet that standard, but also the timing and water source location requirement to meet the standard. In general, Delta Wetlands believes that the SWRCB's process should review the relative impacts of various changes in the flow regime in the Delta and Delta Wetlands will be prepared in this process to demonstrate modelling approaches that should be considered for this purpose.

B. What level of protection is required by the California Water Code and the Clean Water Act for protection of public trust uses in the Bay-Delta Estuary?

Whatever level of protection is required, the SWRCB should set standards based on the best science available and the standards should be flexible depending on year types or a progression of year types which include the consideration of critical years. Without such consideration, resulting environmental impacts and benefits, as well as water costs, may not be adequately balanced.

C. What are the principal environmental, water supply and economic effects of USEPA's draft standards? Should these standards, or modified versions of these standards, be considered as alternatives in this review?

It is incumbent upon the SWRCB to review the EPA Draft Standards as part of this process and modified versions of those standards should also be reviewed. Delta Wetlands believes that it can offer a unique perspective to the SWRCB on EPA's Draft Standards. Delta Wetlands has been required by EPA, through the U.S. Army Corps of Engineers, to include EPA's Draft Standards in its project modelling related to the environmental analysis. Later in this process, Delta Wetlands will be prepared to address the impacts of the EPA's Draft Standards on projects in the Delta.